TechLaw

3011 Sutton Gate Drive, Suite 240
Suwanee, Georgia 30024
(770) 752-7585
(703) 818-8813 (Fax)
www.techlawinc.com

83077-4-22-DR-1099

August 6, 2021

Ms. Constance A. Jones
U.S. Environmental Protection Agency, Region 4
AFC – 11th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-3104

Reference: EPA Contract No. EP-S4-14-01; EPA Task Order No. 4022; Oak Ridge Reservation, Oak Ridge, Tennessee; Site No. 04D6; Technical Review of the Record of Decision for Comprehensive Environmental Response, Compensation, and Liability Act Oak Ridge Reservation Waste Disposal at the Environmental Management Disposal Facility, Oak Ridge, Tennessee, DOE/OR/01-2794&D1, dated June 2021; Task 1.2; TDD 4TK22.1.2.004

Dear Ms. Jones:

Enclosed please find TechLaw's high-level technical review of the Record of Decision for Compensation Environmental Response, Compensation, and Liability Act Oak Ridge Reservation Waste Disposal at the Environmental Management Disposal Facility, Oak Ridge, Tennessee, DOE/OR/01-2794&D1, dated June 22, 2021 (the ROD).

One of the Remedial Action Objectives (RAOs) to assure protectiveness during operation and post-closure is to maintain a 15-foot unsaturated zone (i.e., 10-foot geologic buffer and the 5-foot liner system) beneath the base of the emplaced wastes, yet Section 1.4 (Description of the Selected Remedy) indicates that "Site-specific groundwater investigations indicate that parts of the site footprint can clearly meet this requirement; however, for higher elevations in the site – particularly in the area of the knoll feature in the proposed CBCV [Central Bear Creek Valley] site footprint – TDEC [Tennessee Department of Environmental and Conservations] and EPA [Environmental Protection Agency] have expressed concern that predicted post-construction groundwater conditions used for preliminary design may not be achievable." A post-Record of Decision (ROD) groundwater field demonstration (GWFD) will be performed to obtain additional groundwater data. However, it is unclear what will occur should the additional groundwater data from the post-ROD GWFD indicate that the predicted post-construction groundwater conditions cannot be achieved. For example, it is unclear if additional engineering controls will be necessary which could impact the accuracy of the +50/-30 percent cost estimate included in the ROD. It is recommended that the scope of the GWFD, which will be detailed in a post-ROD Remedial Design Work Plan, be closely reviewed, as the GWFD could indicate the RAO cannot be met at the selected onsite location.

TDEC requires that "The hydrogeologic unit used for disposal shall not discharge groundwater to the surface within the disposal site." As noted in Section 2.13.2.2 [Exception to TDEC 0400-20-11-.17(1)(h)], the proposed CBCV site footprint does not consistently (e.g., based on seasonal precipitation) meet this criterion for the current (pre-construction) site hydrogeologic features.

As a result, an exemption to the TDEC siting criterion was requested. It is unclear if this exemption was granted.

Similarly, the Department of Energy (DOE) requires a waiver to the Toxics Substances Control Act of 1976 (TSCA) 40 Code of Federal Registry (CFR) 761.75(c)(4) which stipulates that "The bottom of the landfill liner system or natural in-place soil barrier shall be at least fifty feet from the historical high-water table." This criteria is unlikely to be achieved at the Environmental management Disposal Facility (EMDF) site (particularly in the area of the knoll feature in the proposed Central Bear Creek Valley [CBCV] site footprint) given the depth to groundwater in the northern portion of the site, thus the need for the waiver. It should be noted that, according to Section 2.13.2.1 [Waiver to TSCA 40 CFR 761.75(c)(4)], waivers of this requirement were granted for the existing Environmental Management Waste Management Facility (EMWMF).

Section 1.2 (Statement of Basis and Purpose) implies that these land use included in the Record of Decision for the Phase I Activities in Bear Creek Valley at the Oak Ridge Y-12 Plant, Oak Ridge, Tennessee, DOE/OR/01-1750&D4, dated May 2000 (BCV Phase I ROD) can be made "by this ROD." Based on Section 1.2, selection of the CBCV site requires updating the basis of remediation goals for the area in Bear Creek Valley (BCV), referred to as Zones 1 and 2 in the BCV Phase I ROD. Specifically, the Zone 2 land use basis for remediation goal in the BCV Phase I ROD requires changing to Department of Energy (DOE)-controlled industrial to be consistent with the presence of a long-term disposal facility and Zone 1 requires modification to a restricted recreational land use for near-term and long-term consideration as the basis of remediation goals, based on proximity of the area to the EMDF. These updates are necessary for the implementation of the EMDF.

Please note that the text also states that Radiological Discharge Limits (RDLs) "will be established by the FFA [Federal Facility Agreement] parties and will be included in this ROD prior to its approval."

Should you have any questions, please call to contact me at (678) 281-1415 or the TechLaw Task Order Manager, Ms. Kristan Avedikian, at (678) 281-1409.

Sincerely,

Joseph Baer, P.G.
Program Manager

Enclosure

cc: R. Oxford, EPA CO (E-mail only)
K. Avedikian, TL (E-mail only)
Atlanta Central Files
L. Flores EPA PO (E-mail only)
N. Goers, TL (E-mail only)

TECHNICAL REVIEW OF THE RECORD OF DECISION FOR COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OAK RIDGE RSERVATION WASTE DISPOSAL AT THE ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY, OAK RIDGE, TENNESSEE, DOE/OR/01-2794&D1, DATED JUNE 2021

OAK RIDGE RESERVATION
OAK RIDGE, TENNESSEE

Submitted to:

Ms. Constance A. Jones
U.S. Environmental Protection Agency, Region 4
Sam Nunn Atlanta Federal Center, 11th Floor
61 Forsyth Street, SW
Atlanta, Georgia 30303- 3104

Submitted by:

TechLaw
3011 Sutton Gate Drive, Suite 240
Suwanee, Georgia 30024

EPA Task Order No.:	**4022**
Contract No.:	**EP-S4-14-01**
EPA TO COR:	**Constance A. Jones**
Telephone No.:	**(404) 562-8551**
TechLaw TOM:	**Kristan Avedikian**
Telephone No.:	**(678) 281-1409**

August 6, 2021

TECHNICAL REVIEW OF THE RECORD OF DECISION FOR COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OAK RIDGE RSERVATION WASTE DISPOSAL AT THE ENVIRONMENTAL MANAGEMENT DISPOSAL FACILITY, OAK RIDGE, TENNESSEE, DOE/OR/01-2794&D1, DATED JUNE 2021

OAK RIDGE RESERVATION
OAK RIDGE, TENNESSEE

The following comments were generated based on a technical review of the Record of Decision for Compensation Environmental Response, Compensation, and Liability Act Oak Ridge Reservation Waste Disposal at the Environmental Management Disposal Facility, Oak Ridge, Tennessee, DOE/OR/01-2794&D1, dated June 22, 2021 (the ROD).

GENERAL COMMENTS

1. According to Section 2.12.2.1 (Conceptual design of EMDF and infrastructure), "The landfill will not be constructed over NT-10 or NT-11, but the berm may be placed over D-10W," yet Figure 2.5 (EMDF conceptual site layout) indicates that the support facilities [i.e., landfill wastewater treatment system (LWTS), storage area, leachate/contact water storage] and Site 7b Borrow Area will be constructed over an unnamed creek. The ROD includes no discussion regarding the short- and long-term impact on this creek or how Applicable and Relevant and Appropriate Requirements (ARARs) will be met. It should be noted that diversion ditches are discussed in the ROD for rerouting D-10W but not for this creek. Revise the ROD to discuss the short- and long-term impact of constructing support facilities and Site 7b Borrow Area over this unnamed creek and how it will comply with ARARs.

2. Based on the topography shown on Figure 2.3 (Phase I characterization and site characteristics of the EMDF site), it is unclear if the outside perimeter of the Environmental Management Disposal Facility (EMDF) landfill is sufficiently set back to allow for the engineered perimeter structures, such as mechanically stabilized earth walls or similar structures, needed to grade the site to the top of the geologic buffer. This is of particular note given the locations of streams NT-10 and NT-11, as shown on Figure 2.5 (EMDF conceptual site layout). Revise the ROD to clarify if the outside perimeter of the EMDF landfill is sufficiently set back to allow for the engineered perimeter structures needed to grade the site to the top of the geologic buffer.

3. The ROD does not discuss the removal of the native soils and rock for the construction of the landfill cells to the top of the geologic buffer. Specifically, the volume of material that will be removed; the depth to get to the top of the geologic buffer in each cell; the location where the material will be stockpiled; and, the costs associated with excavating and moving the native soils are not discussed and/or referenced. In addition, the ROD does not discuss the clearing and grubbing of the wooded area at the site. Specifically, it is unclear how and when the trees and

undergrowth will be removed; where the removed material will be stockpiled and/or disposed; if measures to ensure slope stability will be needed following clearing and grubbing; and, the costs associated with the clearing and grubbing. Revise the ROD to clarify the volume of material that will be removed; the depth to get to the top of the geologic buffer in each cell; the location where the material will be stockpiled; and, the costs associated with moving the native soils. In addition, revise the ROD to provide details regarding the clearing and grubbing of the wooded area at the site.

4. Section 2.7 (Summary of Site Risks) is inadequate and does not support the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) guidance for protecting human health and the environment. Although there is no baseline human health risk assessment (HHBRA) for the disposal decision, constituents of concern (COCs) and associated site risks for wastes generated by other operable units on the Oak Ridge National Laboratory (ORNL) site are identified in existing and forthcoming CERCLA documents. Additionally, Section 1.2 (Statement of Basis and Purpose, Page 1-3), states that the selection of the CBCV for CERCLA wastes constitutes a change in Zone 2 land use to Department of Energy (DOE)-controlled industrial, to be consistent with the presence of a long-term disposal facility. Because the BCV Phase I ROD was based on a potential future land use of recreational use in the near-term and unrestricted use in the long-term, an updated discussion of industrial receptors and associated exposure pathways should be presented in the CBCV ROD in the absence of a formal HHBRA. Thus, revise the ROD for the EMDF site to include COCs for each anticipated waste/medium, insofar as possible (e.g., for wastes derived from CERCLA cleanup at Y-12 and ORNL were described in Section 2.5.6 [Contamination] of this document); exposure pathways of interest; and receptors of interest, with particular emphasis on the change in land use from recreational/unrestricted to industrial.

5. Section 2.9.2 (Alternative 2 – Onsite Disposal Alternative) indicates that a drainage system to intercept and divert upgradient stormwater and shallow groundwater, resulting from stormflow, away from the landfill will be a component of the design; however, DOE has yet to demonstrate that this diversion can be accomplished. It should be noted that Section 2.12.1 (Summary of the Rationale for the Selected Remedy) indicates that the "need for underdrains is limited to consideration under berms. Any/all groundwater intercepts in use during disposal operations are conceptualized as not necessary or operational following closure and will not be under the waste." While it is possible to divert surface flow, it is not possible to divert flow in bedrock fractures that support springs and surface flow. These bedrock fractures may not be visible until all surface flow is diverted, the excavation is complete, and a significant rainstorm occurs. Revise the ROD to provide information to substantiate that DOE can intercept and divert upgradient stormwater and shallow groundwater, resulting from stormflow, away from the landfill without the use of underdrains.

6. According to Section 2.12.2 (Description of the Selected Remedy), "The footprint and supporting features could change during the design of the landfill." While it is

understood that some changes are likely to occur, especially following the post-ROD groundwater field demonstration (GWFD) which will be performed to obtain additional groundwater data, it is unclear if significant changes to the footprint and supporting features would trigger a re-evaluation of the construction of the EMDF in CBCV or the construction requirements of the EMDF. Revise the ROD to clarify if significant changes to the footprint and supporting features during the design phase would trigger a re-evaluation of the construction of the EMDF in CBCV.

7. According to Section 2.12.3 (Cost Estimate for the Selected Remedy), the Remedial Investigation/Feasibility Study (RI/FS) cost estimates were prepared with an accuracy of +50 percent to -30 percent; however, it is unclear if fill material, needed to create an engineered structure (i.e., replacement for geologic buffer), was factored into the selected remedy cost. In addition, Section 2.13.3 (Cost Effectiveness) indicates that, "If the schedule for construction of EMDF or the Oak Ridge NPL [National Priority List] Site CERCLA cleanup actions were to be delayed due to funding or other factors, the cost for the project would increase;" however, it is unclear if these increases would remain within the +50/-30 percent cost estimate. Further, it is unclear if the cost estimate includes the replacement of the cover system. As noted in Section 2.10.3 (Long-term Effectiveness and Permanence), the landfill would be "designed to remain effective for over 1000 years." Revise the ROD to clarify if the costs for fill material, should they be needed to create an engineered structure, were included in the +50/-30 percent cost estimate. In addition, revise the ROD to clarify if the costs for the project, should delays occur, remain within the +50/-30 percent cost estimate. Further, revise the ROD to clarify if the costs for replacing the cover system were included in the +50/-30 percent cost estimate.

8. Section 2.14 (Documentation of Significant Changes) indicates that several ARARs were determined to not be relevant and appropriate and were removed since the RI/FS was developed; however, the ARARs removed are not identified. Further, justification for the removal of the ARARs is not provided and/or referenced. Revise the ROD to identify that ARARs removed since the RI/FS and provide the justification for the removal of the ARARs.

9. A graphical depiction of the conceptual site model (CSM) has not been provided in the ROD. As a result, the relationship between sources of contamination, types of contaminants and affected media, routes of migration, and receptors is unclear. Page 6-10 of the A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents, EPA 540-R-98-031, dated July 1999 (the ROD Guidance) states that, "A graphical depiction of the CSM may be appropriate to include in the ROD as it provides a good presentation of the overall site conditions and basis for taking an action, and can be referenced when discussing the overall site management strategy and the specific remedial action objectives addressed by the Selected Remedy." Revise the ROD to include a graphical depiction of the CSM similar to the example provided in Highlight 6-10 (Example Conceptual Site Model for Contaminated Soil) of the ROD Guidance.

10. Section 2.12.3 (Cost Estimate for the Selected Remedy) and Table 2.8 (Total estimated project costs) lack sufficient detail. For example, a breakdown of the lump sum costs is not provided. Further, the components and assumptions associated with the lump sum costs are not provided and/or discussed (e.g., costs for wetland mitigation are not specified). While detailed cost estimates are included in the RI/FS, revise the ROD to include sufficient detail regarding the cost estimates including a breakdown of the lump sum costs and the components and assumptions associated with the lump sum costs.

11. Table 2-8 (Total estimated project costs) includes the costs associated with the construction of Cell 5; however, the ROD, including Section 2.12.3 (Cost Estimate for the Selected Remedy), does not propose construction of five cells. Based on Figure 2.5 (EMDF conceptual site layout) and the text, only four cells are proposed. If Cell 5 will not be constructed, revise Table 2-8 to only include the costs associated with the construction of Cells 1-4. If Cell 5 will be constructed, revise the ROD to consistently present construction of five cells.

12. Table 2-8 (Total estimated project costs) includes costs based on 2012 dollars which were updated to 2016 dollars; however, all costs in the ROD should be based on 2021 dollars. This is of particular concern given that the post-ROD groundwater field demonstration (GWFD) will take at least two years, after which the costs will be even more out of date. Please revise the ROD to include 2021 costs to ensure the ROD meets the costing requirements outlined in the ROD Guidance.

SPECIFIC COMMENTS

1. **Section 2.2.1, Previous Investigations and Data Sources, Page 2-7:** According to Section 2.2.1, subsurface material tests were conducted to obtain design data for selecting the appropriate materials to develop the engineering design for the landfill; however, a summary of the subsurface material tests and their findings is not included in the ROD. Revise the ROD to include a summary of the subsurface material tests and their findings.

2. **Figure 2.3, Phase I characterization and site characteristics of the EMDF site, Page 2-8:** The contours on Figure 2.3 are not labeled and the legend does not specify the contour interval. Revise Figure 2.3 to label the contours and/or update the legend to specify the contour interval.

3. **Section 2.5.2, Groundwater, Pages 2-12 and 2-13:** The text does not discuss the depth to water at the various well pairs depicted on Figure 2.3 (Phase I characterization and site characteristics of the EMDF site) nor does it discuss the distance between the water table and the bottom of the proposed bottom liner beneath the four cells. Revise Section 2.5.2 to discuss the depth to water at the various well pairs depicted on Figure 2.3 and the distance between the water table and the bottom of the proposed bottom liner beneath the four cells.

4. **Section 2.5.3, Surface Water, Page 2-14:** Section 2.5.3 states, "Several seeps are located adjacent to the drainages and tributaries, indicating localized shallow groundwater discharge occurs there at least seasonally;" however, the locations of the seeps are not included on any ROD figure. In addition, it is unclear whether there are any seeps within or adjacent to the proposed landfill berms. This is of particular concern because if any of these seeps are located within the proposed landfill footprint, it is unlikely that stream underflow (i.e., water flowing in bedrock, likely in fractures) can be diverted successfully. Revise the ROD to include the locations of the seeps discussed in Section 2.5.3 on a figure.

5. **Section 2.5.4, Ecological Resources, Page 2-14:** While detailed bat surveys were conducted within the EMDF area in 2017 and 2018, additional acoustic surveys should be conducted as part of the Early Site Preparation construction activities listed in Section 2.12.2.2 (Construction activities). Revise Section 2.12.2.2 to include additional acoustic surveys to identify threatened and endangered species at the EMDF site prior to construction.

6. **Section 2.5.5, Cultural Resources, Page 2-15:** Section 2.5.5 indicates that DOE intends to avoid the Douglas Chapel Cemetery and preserve it in situ as well as maintain access to the cemetery for visitors; however, this is not conveyed on Figure 2.5 (EMDF conceptual site layout). Specifically, no rerouted roads to the cemetery are shown. Revise the ROD to clarify how access to the Douglas Chapel Cemetery will be maintained for visitors given the proximity of the cemetery to the EMDF, borrow area, and support facility, shown on Figure 2.5.

7. **Section 2.10.8, State Acceptance, Page 2-29:** Section 2.10.8 states, "The State supports construction of the EMDF at the CBCV site;" however, documentation of this support is not provided and/or referenced. It should be noted that Table 2.1 (Summary of CERCLA evaluation criteria for disposal alternatives) indicates that, "The State conditionally supported identification of the CBCV site as the preferred alternative. This conditional support of CBCV was based on its potential as the preferred site to meet DOE's estimated disposal capacity needs without relying on engineered systems for collecting and discharging groundwater beneath the waste footprint." Revise Section 2.10.8 to clarify if the State support is conditional and provide documentation that the state supports construction of the EMDF at the CBCV site.

8. **Section 2.12.2.2, Construction activities, Pages 2-38 and 2-39:** Section 2.12.2.2 states, "Borrow material for EMDF will be obtained from the knoll just east of the facility and other locations at ORR, which will be developed during this early phase;" however, it is unclear why borrowing materials from an adjacent knoll is proposed when borrow material will be available from the EMDF site. As noted in the Phase 1 Construction subsection of Section 2.12.2.2, "The site will be graded to the top of the geologic buffer and the perimeter berm will be constructed to support the first cell(s)." If the materials excavated from the EMDF site are suitable, they should be

reused. Revise Section 2.12.2.2 to clarify why borrowing materials from an adjacent knoll is proposed when borrow material will be available from the EMDF site.

9. **Section 2.12.3, Cost Estimate for the Selected Remedy, Page 2-48 and Table 2.8, Total estimated project costs, Page 2-49:** Based on Section 2.12.3 and Table 2.8, present worth costs for the alternatives were calculated using a real discount rate of 1.5 percent according to the Office of Management and Budget (OMB) Circular No. A-94, dated November 2016; however, it is unclear why the OMB Circular No. A-94, dated December 2020 was not utilized. Revise the ROD to utilize the current real discount rate.

10. **Section 2.13.2.1, Waiver to TSCA 40 CFR 761.75(c)(4), Page 2-51:** The Toxics Substances Control Act of 1976 (TSCA) 40 Code of Federal Registry (CFR) 761.75(c)(4) waiver appears to be based on an assumption that the liner and leachate collection system will maintain integrity, but currently available high density polyethylene (HDPE) and geosynthetics will break down over time. A few feet of clay in the liner system and 10 feet of engineered material in the buffer is unlikely to be sufficient to contain contamination over thousands or tens of thousands of years As such, it appears that the proposed hydraulic conductivity of 10^{-5} centimeters per second (cm/sec) is sufficient. Revise Section 2.13.2.1 to clarify why a hydraulic conductivity of 10^{-5} cm/sec is proposed rather than a more typical hydraulic conductivity of 10^{-6} cm/sec.

11. **Section 2.14, Documentation of Significant Changes, Page 2-56:** According to Section 2.14, a slight modification to the eastern boundary of the landfill was made as part of the conceptual design process "but it does not change any of the evaluation of alternatives including demonstration of protectiveness or compliance with ARARs;" however, the reason for this modification is not discussed. This modification is of particular note given the location of the Douglas Chapel Cemetery, as shown on Figure 2.3 (Phase I characterization and site characteristics of the EMDF site), to the eastern boundary. Revise the ROD to clarify the reason for the modification to the eastern boundary of the landfill and to clarify how it remains protective and compliant with ARARs.

12. **Part 3, Responsiveness Summary**: Part 3, Responsiveness Summary included a summary of outreach commitments previously met to ensure public awareness and DOE's response to comments received from the public review and comment period.

    The "Summary of Comments and Responses" presented the comments from 194 individuals comments and DOE's response. In summary, the DOE identified the four general areas of supportive comments and responded to supportive comments with a standard response. Many of the unsupportive or opposing comments requested additional information, and "many of the comments addressed the following concerns:

    - "Opportunity to review and comment on the waste acceptance criteria (WAC) prior to issuing with the ROD'

- Concerns with mercury-contaminated waste
- Need for waivers for regulatory compliance
- Oak Ridge's underlying geology and rainfall
- Overestimation of offsite disposal cost and risk
- Impact of hazardous waste disposal site in Oak Ridge on home values and attracting people/businesses to Oak Ridge."

The DOE developed a standard response addressing each of the above concerns. In some cases, the public comment or concern was addressed using the standard language developed for the above outlined subject(s). In some cases, the DOE provided standard responses with additional language specific to the public comment. The following responses were identified as deficient:

- The standard responses provided did not address the subject or concern(s) of the public comment: Comments 114, 144, 149, 155, and 180.
- The response is insufficient and additional information may be warranted:
  - Comment 115: The response does not address the citizen's concern. For example, the DOE chose not to respond to the statement that, "Choosing a solution before all ground water impact testing is complete (per David Adler) just screams that a decision has already been made regardless of environmental impact." The response should explain why shipping wastes to an area with an extremely low water table would not be preferable.
  - Comment 117: The response does not address the request for a required environmental impact statement (similar to Comment 128) and provides an insufficient response to questions regarding hydrogeology.
  - Comment 118: The response does not address concerns that engineering design components (diversion structures, the gravel drains, the pipes, the liners, the caps) can be expected to fail.
  - Comment 122: The response does not address socioeconomic concerns or address the request for a cost-benefit analysis.
  - Comment 124: The response does not address socioeconomic concerns.
  - Comment 128: The response does not address concerns regarding siting, harm to an undisturbed area, or proximity of residences.
  - Comment 129: The response do not address the preference for disposal in a dry area (such as Utah).
  - Comment 130: The response do not address the preference for disposal in a dry area (such as Utah).
  - Comment 132: The response does not address concerns regarding siting or mercury contamination.
  - Comment 134: The response does not address concerns regarding unstable geology, groundwater, or proximity to population.
  - Comment 135: The response does not address concerns regarding the preference for disposal elsewhere.
  - Comment 138: The response does not address concern regarding the performance of the liners.
  - Comment 147: The response does not address the concerns regarding mercury contamination.

- Comment 154: The response does not address the concerns regarding mercury contamination.
- Comment 160.11: The response does not address the concerns including, but not limited to underdrains, mercury contamination, or separation of waste from groundwater.
- Comment 160.17: The response does not address the comment. For example, the citizen requests an update on when the Environmental Management Waste Management Facility will be 100 percent full and the current contingency plan if this Proposed Plan is not approved by that time. None of the numerous and detailed technical concerns are addressed.
- Comment 162: The response does not fully address the concerns regarding future rainfall amounts and how this may impact the design.
- Comment 165: The response does not fully address the comment. Additional response is warranted.
- Comment 167: The response does not address concerns regarding hydrogeology or the use of underdrains.
- Comment 168.24: The comment warrants a response to clarify the status of the administrative record supporting the proposed plan.
- Comment 174: The response does not fully address the comment.
- Comment 175, Part 2: The DOE does not provide a response to Part 2 of the comment.
- Comment 179: The response does not adequately address the comment, including the proximity of residences with private wells. Additional response is warranted.
- Comment 184: The response does not address several items including: 2.d (PDF page 292), 2.e (PDF page 292), 2.b (PDF 294), and 2.c (PDF 294).